

**UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF TEXAS  
Dallas Division**

<p>CHARLENE CARTER,</p> <p style="text-align: center;">Plaintiff,</p> <p>v.</p> <p>SOUTHWEST AIRLINES CO., AND TRANSPORT WORKERS UNION OF AMERICA, LOCAL 556,</p> <p style="text-align: center;">Defendants.</p>	<p>Civil Case No. 3:17-cv-02278-X</p> <p><b>PLAINTIFF CHARLENE CARTER’S APPENDIX IN SUPPORT OF HER MOTION TO COMPEL DISCOVERY FROM DEFENDANT TRANSPORT WORKERS UNION OF AMERICA, LOCAL 556</b></p>
--	--

**APPENDIX OF EXHIBITS**

A.	Carter’s Request for Production of Documents to Local 556.....	App. 1
B.	Carter’s Interrogatories to Local 556.....	App. 14
C.	Local 556’s Original Responses to Carter’s Requests for Production.....	App. 21
D.	Local 556’s Original Responses to Carter’s Interrogatories.....	App. 29
E.	Local 556’s Amended Responses to Carter’s Requests for Production .....	App. 34
F.	Local 556’s Amended Responses to Carter’s Interrogatories.....	App. 42
G.	Local 556’s “Draft Privilege Log”.....	App. 46
H.	Carter and Local 556 Discovery Correspondence .....	App. 50

Dated: May 14, 2020

Respectfully submitted,

s/ Jason E. Winford (with permission)  
David E. Watkins  
Texas Bar No. 20922000  
*dwatkins@jenkinswatkins.com*  
Jason E. Winford

Texas Bar No. 00788693  
*jwinford@jenkinswatkins.com*  
JENKINS & WATKINS, P.C.  
4300 MacArthur Avenue, Suite 165  
Dallas, Texas 75209  
Tel: 214-378-6675  
Fax: 214-378-6680

s/ Matthew B. Gilliam  
Mathew B. Gilliam (*admitted pro hac vice*)  
New York Bar No. 5005996  
*mbg@nrtw.org*  
Jeffrey D. Jennings (*admitted pro hac vice*)  
Virginia Bar No. 87667  
*jdj@nrtw.org*  
c/o National Right to Work Legal Defense  
Foundation, Inc.  
8001 Braddock Road, Suite 600  
Springfield, Virginia 22160  
Tel: 703-321-8510  
Fax: 703-321-9319

*Attorneys for Plaintiff Charlene Carter*

**Certificate of Service**

I hereby certify that on May 14, 2020, I electronically filed the foregoing document with the Clerk of Court by using the CM/ECF system, which will send a notice of electronic filing to all counsel of record.

s/ Matthew B. Gilliam